

# EXHIBIT B

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHARLENE CARTER )  
VS. ) CIVIL ACTION NO.  
 ) 3:17-CV-02278-X  
 )  
SOUTHWEST AIRLINES CO., AND )  
TRANSPORT WORKERS UNION OF )  
AMERICA, LOCAL 556 )

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CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF  
AUDREY STONE  
NOVEMBER 24, 2020  
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ANSWERS AND DEPOSITION OF AUDREY STONE,  
produced as a witness at the instance of the  
Plaintiff, taken in the above-styled and -numbered  
cause on NOVEMBER 24, 2020, at 9:07 a.m., before  
CHARIS M. HENDRICK, a Certified Shorthand Reporter  
in and for the State of Texas, witness located at  
Gillespie Sanford LLP, 4803 Gaston Avenue, Dallas,  
Texas, pursuant to the Federal Rules of Civil  
Procedure, the current emergency order regarding  
the COVID-19 State of Disaster, and the provisions  
stated on the record or attached hereto.

1 specifically addressing that.

2 Q. Okay. And did Southwest also have a, I  
3 guess, sexual harassment and discrimination policy  
4 at that time?

5 A. Yes.

6 Q. Okay. And do you know if any flight  
7 attendants were getting called in because their  
8 social media activity was alleged to have violated  
9 that sexual harassment, discrimination policy?

10 A. Again, I don't recall that specifically.  
11 Because all of my conversations that I was having  
12 with Southwest leadership that I had just spoken to  
13 were specific to the social media violations.

14 Q. Okay. Now, I want to go back a second.  
15 You mentioned Brian Talburt. Who -- who was Brian  
16 Talburt?

17 A. He's a Southwest Airlines flight  
18 attendant.

19 Q. Okay. And he is still a Southwest flight  
20 attendant?

21 A. Yes.

22 Q. Okay. And has he held any positions with  
23 the union?

24 A. He's not held the elected positions. He  
25 has held, I believe, positions helping the

Page 50

1 negotiating team. And I think the first one was  
2 called pre- -- the precinct captain program, before  
3 my time. And then we had our version of one at the  
4 beginning of our negotiations -- was called the  
5 contract action network. So he was one of our --  
6 our flight attendants that was on that.

7 Q. Okay. And what is the contract action  
8 network?

9 A. They were flight attendants brought in  
10 from all of the domiciles to meet with the  
11 negotiating team and our strategic advisor and talk  
12 about how best to educate our flight attendants.  
13 Because we are a large work group spread out across  
14 the country, what communication channels should we  
15 be using to talk to them to direct people to  
16 information about negotiations.

17 They would do what we would call  
18 lounge mobilizations where we would have a  
19 coordinated day, we would publicize it in advance  
20 and let our members know that on this day, in all  
21 domiciles, during these times, members of your  
22 negotiating team, flight attendants on our contract  
23 action network, would be in the lounges to answer  
24 questions about negotiations, what was going on.

25 So they were an additional kind of

Page 51

1 bridge to help funnel communication and information  
2 from the negotiating team to help dis- --  
3 disseminate it to the membership.

4 Q. Okay. And did you call this CAN for sure  
5 -- short?

6 A. Yes.

7 Q. And about how many flight attendants were  
8 -- were involved in the contract action network?

9 A. I -- initially, I believe we had two to  
10 three per domicile; so 20-plus. And then we -- we  
11 had people, you know, sign up to be an additional  
12 part of that. I don't know what the total number  
13 ended up being.

14 Q. Okay. And when -- when was Brian Talburt  
15 part of the contract action network?

16 A. I believe -- I believe we put that in  
17 place in 2014.

18 Q. Do you know if he's continuously been  
19 involved with the contract action network?

20 A. No, he hasn't. We -- we -- the work with  
21 contract action network ended in 2015.

22 Q. Okay. And why did that end in 2015?

23 A. After the first tentative agreement  
24 failed, that particular committee ended.

25 Q. Okay. And was -- was -- did -- did the --

1 did anyone decide to end the contract action  
2 network committee because it was deemed to be  
3 unsuccessful in light of the -- the tentative --  
4 tentative agreements' rejection?

5 A. No, it wasn't that. It was that we just  
6 -- we -- we revamped everything. Even our  
7 negotiating team had a change of members. We -- we  
8 took a reset with everything related to bargaining  
9 after that. And that was related to our bargaining  
10 agreement.

11 Q. Okay. And do you know when Brian Talburt  
12 was a precinct captain?

13 A. I don't. That was before -- that program  
14 was set up before I worked for Southwest.

15 Q. Okay. And do you know if Brian Talburt  
16 held any other positions with the union?

17 A. No.

18 Q. No, he didn't; or, no, you don't --

19 A. Well, not to my knowledge.

20 Q. Okay. And what -- what do you remember  
21 about Brian Talburt's, I guess, social media  
22 violation at that time, in 2015?

23 A. He had had a converse -- there was, I  
24 believe, a conversation about a flight attendant.  
25 And he and another flight attendant were talking

1           A. No. It was just to be there in support of  
2 equal rights and civil rights and to carry the  
3 enthusiasm from our members that week at the  
4 meeting, you know, about wanting to support each  
5 other and standing up for equality and what that  
6 looks like. It was -- it was -- you know, our goal  
7 was just to -- to be there in solidarity with some  
8 of the other union groups and leaders that were  
9 there.

10          Q. Did you understand that you personally  
11 were there advocating for abortion in any way?

12          A. No.

13          Q. Did anybody else in the group from 556  
14 indicate to you that they were there to advocate  
15 for abortion?

16          A. No. And one of our members that was there  
17 with us was visibly pregnant.

18          Q. And you personally -- or do you consider  
19 yourself to be an advocate for abortion?

20          A. No.

21          Q. What -- what is your view with respect to  
22 abortion and reproductive rights?

23          A. I am personally pro-life. I don't believe  
24 it's -- I don't believe that I could ever make a  
25 decision to terminate a pregnancy. However, I

1    don't believe I or anyone else has the right to  
2    make that decision for another woman. And -- and  
3    my career before Southwest Airlines shifted that  
4    for me. Because prior to that, I had been very  
5    black and white on pro-life as the only option.

6           Q. What was your view before and what changed  
7    it?

8           A. Before, I -- I felt like -- I felt like it  
9    was -- it was -- was taking a baby's life; and that  
10   that was wrong. That's how I was raised. That was  
11   my religious belief as well. And then I went to  
12   work for an outpatient child and adolescent mental  
13   health clinic.

14           And in that capacity, I worked with  
15   children and teenagers, as well as their parents.  
16   And during my time there, two of the clients I  
17   worked with, two of the children were the product  
18   of an incestual rape. And after working with them  
19   and their family, it shifted it and it was no  
20   longer a black-and-white issue for me because I  
21   didn't think anyone had the right to tell either of  
22   those women that they had to carry those  
23   pregnancies to term when it was a rape from a  
24   brother or an uncle or anyone else.

25           Q. While you were at the march, did you see